

Overview of Meal Counting and Claiming Process for Connecticut School Nutrition Programs

This document summarizes the Connecticut State Department of Education's (CSDE) requirements for the meal counting and claiming process in local educational agencies (LEAs); and assists LEAs with meeting the U.S. Department of Agriculture (USDA) regulations for the National School Lunch Program (NSLP), School Breakfast Program (SBP), Seamless Summer Option (SSO) of the NSLP, Afterschool Snack Program (ASP), and Special Milk Program (SMP). The USDA provides reimbursement for each meal (free, reduced-price, and paid) that meets program requirements and is served to an eligible student. To obtain this reimbursement, LEAs must accurately count, record, and claim the number of meals actually served to students by eligibility category. Additionally, the number of free and reduced-price meals served and claimed for reimbursement must have adequate documentation on file to support the claim. The six essential elements of an acceptable counting and claiming system include:

- eligibility documentation;
- money collection system;
- point-of-service (POS) meal count system;
- reports (e.g., financial, edit check worksheets, and other required documents);
- claim for reimbursement; and
- internal controls.

LEAs must ensure that all meal counting and claiming processes prevent overt identification. Overt identification is any action that may openly or physically identify a student being recognized as potentially eligible to receive or be certified for free or reduced-price meals. LEAs must ensure that a child's eligibility status is not disclosed at any point in the process of providing free or reduced-price meals, including notification of eligibility, meal service in the cafeteria, at the POS, and through the payment method.

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Step	Task	When	Resources
1	Maintain Eligibility Documentation <ul style="list-style-type: none"> For meal counts to be counted in the correct eligibility category, the LEA must correctly determine the eligibility of each student. The LEA must generate an accurate benefit issuance list (also called a roster) that identifies students who are eligible for free or reduced-price meals, and is used in the meal counting system. Names on the roster must match approved applications or direct certification data. 	Ongoing	Application Forms for Free and Reduced Meals <ul style="list-style-type: none"> Forms for School Nutrition Programs (CSDE webpage) Calendar <ul style="list-style-type: none"> Calendar of School Nutrition Program Requirements and Activities (CSDE) Eligibility Criteria <ul style="list-style-type: none"> Direct Certification for School Nutrition Programs (CSDE webpage) Eligibility Manual for School Meals (USDA) Income Guidelines for School Nutrition Programs (CSDE webpage) Data Sharing <ul style="list-style-type: none"> Disclosure Release Request for Free or Reduced Eligibility Status (CSDE) USDA Memo SP 42-2014, SFSP 17-2014, CACFP 11-2014: Sharing Aggregate Data to Expand Program Access and Services in Child Nutrition Programs Documentation for Policy Statement for Free and Reduced-price Meals <ul style="list-style-type: none"> Meal Application and Data Management Process (CSDE)

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Step	Task	When	Resources
2	<p>Develop Money Collection System and POS Meal Count System</p> <ul style="list-style-type: none"> • All LEAs must have an accurate written money collection system and POS meal count system by site that are approved by the CSDE. This information is submitted annually to the CSDE as part of the online application using the CSDE's form, <i>Site Information on Money Collection and Point-of-Service (POS) Meal Count System</i>. This form includes a chart with information on allowable systems. • Revisions must be approved by the CSDE prior to implementation. • In addition to submitting site information on the money collection system and POS meal count system, LEAs must consider policies and procedures for: <ul style="list-style-type: none"> ○ times of meal service; ○ handling negative meal account balances; ○ handling adult and visitor meals; ○ taking accurate POS meal counts including field trips and student workers; ○ identifying reimbursable meals; ○ conducting edit checks and site monitoring; ○ handling/replacing/counting dropped or second meals; ○ consolidating meal counts; and ○ training staff. 	At the time of submitting the new LEA application and updated as needed	<p>Collection and POS Meal Count Systems</p> <ul style="list-style-type: none"> • Site Information on Money Collection and Point-of-Service (POS) Meal Count System (CSDE) <p>Edit Checks</p> <ul style="list-style-type: none"> • See “Edit Check Worksheets” in step 4 <p>Lunch Periods</p> <ul style="list-style-type: none"> • Circular Letter C-9: Federal and State Requirements for Provision and Timeframe of Daily Lunch Period for Students (CSDE) <p>Meal Counting and Claiming</p> <ul style="list-style-type: none"> • Meal Counting and Claiming Manual (USDA) <p>Meal Patterns</p> <ul style="list-style-type: none"> • Meal Patterns for Grades K-12 in School Nutrition Programs (CSDE webpage) • Meal Patterns for Preschoolers in School Nutrition Programs (CSDE webpage) <p>Offer versus Serve</p> <ul style="list-style-type: none"> • Offer versus Serve for Grades K-12 in School Nutrition Programs (CSDE webpage)

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3	<p>Conduct Daily POS Meal Count</p> <ul style="list-style-type: none"> Meals must be counted at the point in the meal service where it can be accurately determined that a reimbursable free, reduced-price, or paid meal has been served to an eligible student. The following essential elements of POS meal counts must be in place. <ul style="list-style-type: none"> Meals must be served to eligible students; adult meals cannot be counted. For all schools except Provision 2 schools in a non-base year and or Community Eligibility Provision (CEP) schools, meals are counted in the correct eligibility category: free, reduced-price, and paid. An application or other acceptable documentation must be on file for each student claimed for free or reduced-price meals. Note: Base year documentation must be on file for Provision 2 schools. CEP schools must have documentation to support the school's Identified Student Percentage (ISP). Count only meals that meet the meal pattern requirements and offer versus serve criteria, if appropriate. Students must be counted one at a time as they go through the line. Tickets or cards cannot be handed in as a group. The POS system does not overtly identify students' eligibility categories. Examples of acceptable meal counting systems include: <ul style="list-style-type: none"> coded rosters (codes such as "F, R, P" are prohibited); coded tickets/tokens; bar-coded and magnetic strip cards; coded identification (ID) cards; and pin pads. <p><i>Continued on next page</i></p>	Daily	<p>Afterschool Snack Program</p> <ul style="list-style-type: none"> Daily Snack Count Record for Grades K-12 (Site/Area Eligible) (CSDE) Daily Snack Count Record for Preschoolers (Site/Area Eligible) (CSDE) Daily Snack Count and Production Record for Grades K-12 (Site/Area Eligible) (CSDE) Daily Snack Count and Production Record for Preschoolers (Site/Area Eligible) (CSDE) Daily Attendance and Snack Count Record (Not Site/Area Eligible) (CSDE) Monthly Attendance and Snack Count Record (Site/Area Eligible) (CSDE) Monthly Attendance and Snack Count Record (Not Site/Area Eligible) (CSDE) <p>Calendar</p> <ul style="list-style-type: none"> Calendar of School Nutrition Program Requirements and Activities (CSDE) <p>Special Milk Program</p> <ul style="list-style-type: none"> Daily Milk Count Worksheet (CSDE) [PDF] [Excel] [Instructions] [Sample Completed Form]

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Step	Task	When	Resources
3	<p>Conduct Daily POS Meal Count, <i>continued</i></p> <ul style="list-style-type: none"> LEAs operating the following programs do not take POS counts based on eligibility but instead take a total count using a tally sheet, roster, clicker or an electronic point-of-sale system: <ul style="list-style-type: none"> Seamless Summer Option (SSO) of the NSLP; ASP (area eligible); Provision 2 sites during non-base years; and Community Eligibility Provision. LEAs using a computerized meal counting system must have a back-up system in place in case of system failure. LEAs that have a full-service interschool agreement with another school must include the recipient site in the LEA's monthly meal count claim. <p><i>During an Administrative Review, the CSDE may take fiscal action if the LEA's meal counting system yields incorrect meal counts.</i></p>	Daily	<p>Nonpricing Programs</p> <ul style="list-style-type: none"> Community Eligibility Provision (CEP) (CSDE webpage) Provision 2 Guidance (USDA) <p>Seamless Summer Option</p> <ul style="list-style-type: none"> Daily Meal Count SFSP (CSDE) Weekly Meal Count Consolidation SFSP (CSDE)

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4	<p>Conduct Edit Checks</p> <ul style="list-style-type: none"> Edit checks are one of the internal controls that LEAs must have in place to ensure an accurate claim for reimbursement. Prior to filing a monthly claim for reimbursement, all LEAs must perform meal count edit checks. <p>Daily Edit Check</p> <ul style="list-style-type: none"> To perform daily meal count edit checks, LEAs must: <ul style="list-style-type: none"> multiply the number of enrolled children approved in each category (free, reduced, and paid) by the attendance factor (AF). compare these numbers, known as attendance-adjusted eligible figures, to the daily counts of free, reduced-price, and paid meals served. document your calculations on an edit check form. if counts exceed the attendance-adjusted number on more than 50 percent of the operation days, provide a written justification on the edit check form next to each applicable date. Electronic meal counting systems may be able to calculate the daily meal count edit checks, however, LEAs must ensure that staff reviews the spreadsheets generated to determine counts that exceed the attendance-adjusted number. Daily edit checks require the use of an AF that is calculated at either the site or district level, and can be calculated monthly or annually. Residential child care institutions (RCCIs) with no day students should use 100 percent for their AF. 	Monthly	<p>Calendar</p> <ul style="list-style-type: none"> Calendar of School Nutrition Program Requirements and Activities (CSDE) <p>Edit Check Worksheets</p> <p>Lunch</p> <ul style="list-style-type: none"> Edit Check Worksheet (CSDE) Instructions (CSDE) <p>Breakfast and Lunch</p> <ul style="list-style-type: none"> Edit Check Worksheet (CSDE) Instructions (CSDE) <p>CEP</p> <ul style="list-style-type: none"> CEP Edit Check Worksheet and Instructions (CSDE)

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Step	Task	When	Resources
5	<p>Submit Monthly Claim for Reimbursement</p> <ul style="list-style-type: none"> LEAs submit their monthly claim for reimbursement electronically through the Child Nutrition Program (CNP) Online Application and Claiming System. To complete the reimbursement claim, LEAs total the POS monthly meal counts by category for each site and enter them into the CNP System by site. The CNP System will immediately inform the LEA of any errors that must be corrected and resubmitted. The CNP System includes security measures to support adequate internal controls through segregation of duties (also known as separation of duties). This concept involves having more than one person involved in the completion of a task. When adequate internal controls or segregation of duties are in place, one person is prevented from having control over all aspects of a particular transaction, thereby minimizing the opportunity for errors and unintended reporting. For more information, see the CSDE's handout, <i>Procedures, User IDs, Passwords and Access for School Nutrition Programs</i>. Once the CNP System accepts the claim, it will process the claim for payment. The target date to submit claims for reimbursement is usually the 15th of the month following the month for which meals are being claimed. The final submission date for an original or adjusted claim is indicated on the CSDE's operational memo, <i>Schedule for Submission of Online Reimbursement Claim Data</i>. Late claims may be considered for payment in the following instances: <ul style="list-style-type: none"> Upward adjusted claim to correct errors discovered on an earlier claim as identified by an independent audit or Administrative Review. Utilizing the one-time only exception for one month (allowed once every 36 months) from the USDA. Adjusting a claim that does not produce a payment. Submitting a downward-adjusted claim that reduces the amount of reimbursement. CSDE will consider one-time only claim submission exceptions for circumstances beyond the LEA's control. The CSDE handles these exceptions on a case-by-case basis. 	Monthly	<p>Calendar</p> <ul style="list-style-type: none"> Calendar of School Nutrition Program Requirements and Activities (CSDE) <p>Online Application and Claiming System</p> <ul style="list-style-type: none"> CNP Online System (CSDE webpage) Procedures, User IDs, Passwords and Access for School Nutrition Programs (CSDE) <p>Claim Submission Schedule</p> <ul style="list-style-type: none"> Claim Submission Schedule for Child Nutrition Programs (CSDE webpage)

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Step	Task	When	Resources
6	<p>Conduct On-site Monitoring</p> <ul style="list-style-type: none"> On-site monitoring is another internal control that LEAs must conduct to ensure an accurate meal counting and collection process is in place. LEAs with multiple sites must monitor their lunch service at all sites to evaluate meal counting procedures by February 1 each year. Beginning in school year 2016-17, LEAs must conduct by February 1, an on-site review of the breakfast counting and claiming system in a minimum of 50 percent of the schools operating the SBP, with each school operating the SBP being monitored at least once every two years. Twice per year, LEAs operating the ASP must assess each site's compliance with the meal pattern, and counting and claiming procedures. LEAs must document monitoring activities. To help identify potential errors, LEAs should rotate the staff that monitors district/agency meal counting procedures. Staff that conducts monitoring should ensure that sites do not claim the following meals/foods: <ul style="list-style-type: none"> adult meals; second meals eaten by eligible student; meals not meeting the meal pattern; meals served outside the required meal periods, unless an approved waiver is in place; a la carte items; and lunches eaten at a RCCI when the student also ate lunch at his/her school. LEAs with a foodservice management company (FSMC) cannot allow FSMC personnel to conduct the on-site monitoring. Monitoring must be done by a LEA employee who does not work directly with the meal counting and claiming system. 	<p>Lunch: By February 1</p> <p>Breakfast: By February 1 (only for 50 percent of the schools operating the SBP)</p> <p>Snack: Two times per year</p>	<p>Calendar</p> <ul style="list-style-type: none"> Calendar of School Nutrition Program Requirements and Activities (CSDE) <p>School Nutrition Programs</p> <ul style="list-style-type: none"> On-site Review Checklist for the NSLP (CSDE) On-site Review Checklist for the SBP (CSDE) <p>Lunch Periods</p> <ul style="list-style-type: none"> Circular Letter C-9: Federal and State Requirements for Provision and Timeframe of Daily Lunch Period for Students (CSDE) <p>Afterschool Snack Program</p> <ul style="list-style-type: none"> ASP On-site Monitoring Form (CSDE)

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Step	Task	When	Resources
7	Report Annual Revenue and Costs: Financial Report <ul style="list-style-type: none"> Federal regulations require a review of the net cash resources of the school food service account to ensure continued nonprofit status. Program income and expenditures must fall within the allowable three months operating costs. LEAs must annually report yearly revenue and costs in the CNP Online System. 	October	Online Application and Claiming System <ul style="list-style-type: none"> CNP Online System (CSDE webpage)

Recordkeeping

LEAs (including all schools electing to participate in CEP and Provision 2) must retain all meal count records, eligibility documents, rosters, edit checks, site monitoring forms, and claims for reimbursement for three years plus the current year, or longer if there is an open audit. Provision 2 sites must also retain all required base-year documents until after a new base year is developed, and for a minimum of three additional years beyond the end of the Provision 2 cycle.

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Glossary

administrative review: A comprehensive evaluation of schools and institutions participating in the NSLP and SBP, conducted every three years by the CSDE.

Afterschool Snack Program (ASP): The USDA's federally assisted snack program implemented through the NSLP. The ASP provides cash reimbursement to help schools serve snacks to children in afterschool activities aimed at promoting the health and well-being of children and youth. Schools must provide children with regularly scheduled activities in an organized, structured and supervised environment that includes educational or enrichment activities, e.g., mentoring/tutoring programs. Programs must meet state or local licensing requirements and health and safety standards. For more information, see the CSDE's [Afterschool Snack Program](#) webpage.

attendance factor: A percentage developed at least once each school year that accounts for the difference between student enrollment and attendance, i.e., the average percentage of enrolled students typically attending school on any given day.

benefit issuance list: A list of students who are eligible for free or reduced-price meals.

claim for reimbursement: The claim submitted to the CSDE on a monthly basis by LEAs to receive reimbursement for meals served under the USDA Child Nutrition Programs.

Community Eligibility Provision (CEP): The CEP allows schools that predominantly serve low-income children to offer free NSLP and SBP meals, without collecting individual household applications for free and reduced-price meals. For more information, see the CSDE's [CEP](#) webpage.

direct certification: A process conducted by states and LEAs to certify eligible children for free meals without collecting household applications. For more information, see the CSDE's [Direct Certification for School Nutrition Programs](#) webpage.

edit check: A required internal control that ensures an accurate claim for reimbursement by comparing the number of students eligible for free, reduced and paid meals with the number of free, reduced and paid meals served.

fiscal action: The recovery of overpayment through direct assessment or offset of future claims, disallowance of overclaims as reflected in unpaid claims for reimbursement, submission of a revised claim for reimbursement, and correction of records to ensure that unfiled claims for reimbursement are corrected when filed.

late claim: A monthly claim for reimbursement that is submitted by the LEA after the final deadline required by the CSDE. For more information, see the CSDE's first operational memorandum of each school year, *Schedule for Submission of Online Reimbursement Claim Data*, on the CSDE's [Operational Memoranda for School Nutrition Programs](#) webpage.

local educational agency (LEA): A public board of education or other public or private nonprofit authority legally constituted within a state for either administrative control or direction of, or to perform a service function for, public or private nonprofit elementary schools or secondary schools in a city, county, township, school district, or other political subdivision of a state, or for a combination of school districts or counties that is recognized in a state as an administrative agency for

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its public or private nonprofit elementary schools or secondary schools. The term also includes any other public or private nonprofit institution or agency having administrative control and direction of a public or private nonprofit elementary school or secondary school, including residential child care institutions, Bureau of Indian Affairs schools, and educational service agencies and consortia of those agencies, as well as the state educational agency in a state or territory in which the state educational agency is the sole educational agency for all public or private nonprofit schools.

meal pattern: The required food components and minimum serving sizes that schools and institutions participating in the USDA Child Nutrition Programs must provide to children to receive federal reimbursement for meals and snacks served.

money collection system: The system used by the school food authority to collect money from students for free, reduced-price and paid meals. For information on allowable systems, see the CSDE's form, [Site Information on Money Collection and Point-of-Service \(POS\) Meal Count System](#).

National School Lunch Program (NSLP): The USDA's federally assisted meal program operating in public and nonprofit private schools and residential child care institutions. The NSLP provides nutritionally balanced, low-cost or free lunches to children each school day. It was established under the National School Lunch Act, signed by President Harry Truman in 1946. For more information, see the CSDE's [National School Lunch Program](#) webpage.

offer versus serve (OVS): A provision that applies to menu planning and the determination of reimbursable school meals in the NSLP and SBP. OVS allows children to decline a certain number of food components or items in the meal. All required meal components must be offered to each child. In the NSLP, students must select at least ½ cup of fruits or vegetables and the full portion (minimum serving size) of at least two other components. In the SBP, students must select at least three food items including at least ½ cup of fruit (or vegetable substitutions, if offered). OVS must be implemented in senior high schools for lunch but is optional for breakfast. For junior high, middle schools and elementary schools, OVS is optional for both breakfast and lunch. For more information, see the CSDE's [Offer versus Serve for Grades K-12 in School Nutrition Programs](#) webpage.

on-site monitoring: A requirement for LEAs with more than one school that requires monitoring of the lunch and breakfast counting and claiming system used in each school under the LEA by February 1 of each year.

overt identification: Any action that may openly or physically identify a student being recognized as potentially eligible to receive or be certified for free or reduced-price meals.

point of service (POS): The point in the food service operation where a determination can accurately be made that a reimbursable free, reduced-price, or paid meal has been served to an eligible child. POS includes two distinct aspects: Identifying a student's eligibility status (free, reduced, or paid) when they receive a reimbursable meal; and identifying the student has selected a reimbursable meal that can be counted and claimed.

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Provision 2: An alternative to collecting individual household applications for free and reduced-price meals that requires participating schools to serve meals to participating children at no charge. Provision 2 reduces household applications to once every four years, and simplifies meal counting and claiming procedures by allowing schools to receive meal reimbursement based on claiming percentages. For more information, see the USDA's [Provision 2 Guidance](#) manual.

reimbursable meal: A meal that meets the USDA meal pattern requirements

School Breakfast Program (SBP): The USDA's federally assisted meal program operating in public and nonprofit private schools and residential child care institutions. The SBP provides nutritionally balanced, low-cost or free breakfasts to children each school day. The program was established under the Child Nutrition Act of 1966 to ensure that all children have access to a healthy breakfast at school to promote learning readiness and healthy eating behaviors. For more information, see the CSDE's [School Breakfast Program](#) webpage.

segregation of duties: An internal control process where more than one person involved in the completion of a task so that one person is prevented from having control over all aspects of a particular transaction, thereby minimizing the opportunity for errors and unintended reporting.

Seamless Summer Option (SSO) of the NSLP: The USDA's federally assisted summer feeding program that combines features of the NSLP, SBP and Summer Food Service Program (SFSP) and serves meals free of charge to children ages 18 and younger from low-income areas. School districts participating in the NSLP or SBP are eligible to apply to the CSDE to participate in the SSFP. SSFP meals follow the meal patterns of the NSLP and SBP. For more information, see the [Seamless Summer Option of the NSLP](#) webpage.

Special Milk Program (SMP): The USDA's federally assisted program that provides milk to children in schools and child care institutions that do not participate in other federal meal service programs. The SMP reimburses schools for the milk they serve. Schools in the NSLP or SBP may also participate in the SMP to provide milk to children in half-day pre-kindergarten and kindergarten programs where children do not have access to the school meal programs. For more information, see the CSDE's [Special Milk Program](#) webpage.

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For more information, see the CSDE's [Meal Counting and Claiming for School Nutrition Programs](#) webpage or contact the [school nutrition programs staff](#) in the CSDE's Bureau of Health/Nutrition, Family Services and Adult Education, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This document is available at <https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Forms/MealCount/MealCountClaim.pdf>.

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- (1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

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